

**United States District Court Northern District of Illinois**  
**MOTION FOR LEAVE TO APPEAR PRO HAC VICE**

Case Title:	In Re Innovatio IP Ventures, LLC, Patent Litigation	Plaintiff(s)
	VS.	Defendant(s)
Case Number: 1:11-cv-09308	Judge: James F. Holderman	

I, Steven C. Cherny hereby apply to the Court  
under Local Rule 83.14 for permission to appear and participate in the above-entitled action on behalf of

Please see attached Exhibit A \_\_\_\_\_ by whom I have been retained.

I am a member in good standing and eligible to practice before the following courts:

Title of Court	Date Admitted
Please see attached Exhibit B	

I have currently, or within the year preceding the date of this application, made pro hac vice applications to this Court in the following actions:

Case Number	Case Title	Date of Application (Granted or Denied)*
1:2011-cv-01638	Innovatio IP Ventures, LLC v. ABP Corporation, et al.	10/13/2011

\*If denied, please explain:  
(Attach additional form if  
necessary)

Pursuant to Local Rule 83.15(a), applicants who do not have an office within the Northern District of Illinois must designate, at the time of filing their initial notice or pleading, a member of the bar of this Court having an office within this District upon who service of papers may be made.

Has the applicant designated local counsel? Yes ☒ No ☐

If you have not designated local counsel, Local Rule 83.15(b) provides that the designation must be made within thirty (30) days.

censured, suspended, disbarred, or otherwise disciplined by any court? Yes ☐ No ☒

or is the applicant currently the subject of an investigation of the applicant's professional conduct? Yes ☐ No ☒

transferred to inactive status, voluntarily withdrawn, or resigned from the bar of any court? Yes ☐ No ☒

denied admission to the bar of any court? Yes ☐ No ☒

held in contempt of court? Yes ☐ No ☒

NOTE: If the answer to *any* of the above questions is yes, please attach a brief description of the incident(s) and the applicant's current status before any court, or any agency thereof, where disciplinary sanctions were imposed, or where an investigation or investigations of the applicant's conduct may have been instituted.

I have read the Rules of Professional Conduct for the Northern District of Illinois and the Standards for Professional Conduct within the Seventh Federal Judicial Circuit, and will faithfully adhere to them. I declare under penalty of perjury that the foregoing is true and correct.

July 2, 2013

s/ Steven C. Cherny

Date

Electronic Signature of Applicant

Applicant's Name	Last Name Cherny		First Name Steven		Middle Name/Initial C.
	Applicant's Law Firm Kirkland & Ellis LLP				
Applicant's Address	Street Address 601 Lexington Avenue				Room/Suite Number
	City New York	State NY	ZIP Code 10022	Work Phone Number 212-446-4965	

(The pro hac vice admission fee is \$100.00 for cases filed before February 1, 2001, and \$50.00 for cases filed on or after that date, and shall be paid to the Clerk. No admission under Rule 83.14 is effective until such time as the fee has been paid.)

**NOTE:** Attorneys seeking to appear pro hac vice may wish to consider filing a petition for admission to the general bar of this Court. The fee for admission to the General Bar is \$176.00 The fee for pro hac vice admission is \$100.00 for cases filed before February 1, 2001, and \$50.00 for cases filed after that date. Admission to the general bar permits an attorney to practice before this Court. Pro hac vice admission entitles an attorney to appear in a particular case only. Application for such admission must be made in each case; and the admission fee must be paid in each case.

**EXHIBIT A**

PARTY TYPE	PARTIES
	<i>Innovatio IP Ventures, LLC v. ABP Corporation, et al.</i> N.D. Ill. Case No. 1:11-cv-01638
Defendants	Cosi, Inc. Meijer, Inc. Dominick's Supermarkets, Inc.
	<i>Innovatio IP Ventures, LLC v. JW Marriott Chicago et al.,</i> N.D. Ill. Case No. 1:11-cv-06478
Defendants	Fairfield Inn Chicago Tinley Park Fairfield Inn Joliet North/Plainfield Fairfield Inn Peru Fairfield Inn & Suites Chicago Naperville/Aurora Rockford Lodging Investors V, LLC ( <i>originally Fairfield Inn &amp; Suites Rockford</i> ) Residence Inn Rockford Towneplace Suites Chicago Naperville
	<i>Innovatio IP Ventures, LLC v. Wingate by Wyndham Schaumburg/Convention Center et al.,</i> N.D. Ill. Case No. 1:11-cv-06479

PARTY TYPE	PARTIES
Defendants	Baymont Inn & Suites Chicago/Aurora Baymont Inn & Suites Chicago/Calumet Baymont Inn & Suites Rockford Days Inn Alsip Days Inn Barrington Days Inn Elgin (n/k/a Lexington Inn & Suites-Chicago West/Elgin) Days Inn Great Lakes North Chicago Days Inn Libertyville Days Inn St. Charles Howard Johnson Addison O'Hare Airport Howard Johnson Lansing Illinois Ramada Lake Shore Chicago Ramada O'Hare (Elk Grove) Super 8 Chicago/Morton Grove Super 8 DeKalb Super 8 Freeport Super 8 Lansing Super 8 McHenry Super 8 Mendota Super 8 Mokena/Frankfort/I-80 Super 8 Morris Super 8 Mundelein/Libertyville Area Super 8 Richmond Super 8 Rockford Super 8 Rock Falls Sterling Area Super 8 Rochelle Super 8 St. Charles Travelodge Hotel O'Hare/Chicago Wingate By Windham Schaumburg/Convention Center
<i>Innovatio IP Ventures, LLC v. Comfort Inn O'Hare, et al.,</i> N.D. Ill. Case No. 1:11-cv-06481	
Defendants	Comfort Inn & Suites (Antioch) Comfort Inn & Suites (Markham) Comfort Inn (Gurnee) Comfort Inn (Mundelein) Comfort Inn (Ottawa) n/k/a Econo Lodge (Ottawa) Comfort Inn (Palatine) Comfort Inn (Waukegan)
<i>CISCO Systems Inc., et al. v. Innovatio IP Ventures LLC</i> Dist. Del. Case No. 1:11-cv-00425-LPS <i>transferred as N.D. Ill. Case No. 1:11-cv-09309</i>	
Plaintiffs	Cisco Systems, Inc. Motorola Solutions Inc.
<i>Innovatio IP Ventures, LLC v. B &amp; B Corporate Holdings, Inc.</i> M.D. Fla. Case No. 8:11-cv-01325-JDW-MAP <i>transferred as N.D. Ill. Case No. 1:11-cv-09310</i>	

PARTY TYPE	PARTIES
Defendant	B & B Corporate Holdings, Inc.
<i>Innovatio IP Ventures, LLC v. MEI-GSR Holdings LLC</i> Dist Nev. Case No. 3:11-cv-00343-LRH -WGC <i>transferred as N.D. Ill. Case No. 1:11-cv-09311</i>	
Defendant	MEI-GSR Holdings LLC d/b/a Grand Sierra Resort and Casino
<i>Netgear Inc. v. Innovatio IP Ventures LLC</i> Dist. Del. Case No. 1:11-cv-01139-LPS <i>transferred as N.D. Ill. Case No. 1:12-cv-00427</i>	
Plaintiff	Netgear Inc.
<i>Innovatio IP Ventures, LLC v. Best Western Arrowhead Lodge &amp; Suites, et al.,</i> W.D. Wis. Case No. 3:11-cv-00643 <i>transferred as N.D. Ill. Case No. 1:12-cv-00428</i>	
Defendants	Best Western Arrowhead Lodge & Suites Best Western Bluffview Inn & Suites Best Western Bridgeview Motor Inn Best Western Claridge Motor Inn Best Western Park Oasis Inn Best Western Plus InnTowner Hotel and the Highland Club Best Western Plus La Crosse Best Western Plus Trail Lodge Hotel & Suites Best Western Resort Hotel & Conference Center Portage
<i>Innovatio IP Ventures, LLC v. Madison Marriott West, et al.,</i> W.D. Wis. Case No. 3:11-cv-00644 <i>transferred as N.D. Ill. Case No. 1:12-cv-00431</i>	
Defendants	Courtyard La Crosse Downtown/Mississippi River Middleton Discovery Springs Lodging Investors, LLC ( <i>originally Courtyard Madison West/Middleton</i> ) Fairfield Inn & Suites Beloit Fairfield Inn & Suites Stevens Point Madison High Crossing Lodging Investors II, LLC ( <i>originally Fairfield Inn &amp; Suites Madison East</i> ) Residence Inn Madison East
<i>Innovatio IP Ventures LLC v. AirTran Airways, Inc.</i> N.D. Ill. Case No. 1:12-cv-03844	
Defendant	AirTran Airways, Inc.
<i>Innovatio IP Ventures LLC v. Barnes &amp; Noble, Inc.</i> N.D. Ill. Case No. 1:12-cv-03856	
Defendant	Barnes & Noble, Inc.

PARTY TYPE	PARTIES
	<i>Innovatio IP Ventures, LLC v. Delta Air Lines, Inc.</i> N.D. Ill. Case No. 1:12-cv-03858
Defendant	Delta Air Lines, Inc.
	<i>Innovatio IP Ventures, LLC v. Home Depot USA, Inc.</i> N.D. Ill. Case No. 1:12-cv-03860
Defendant	Home Depot USA, Inc.
	<i>Innovatio IP Ventures, LLC v. Jewel Food Stores, Inc.</i> N.D. Ill. Case No. 1:12-cv-03865
Defendant	Jewel Food Stores, Inc.
	<i>Innovatio IP Ventures, LLC v. McDonald's Corporation</i> N.D. Ill. Case No. 1:12-cv-03870
Defendant	McDonald's Corporation
	<i>Innovatio IP Ventures, LLC v. Starbucks Corporation</i> N.D. Ill. Case No. 1:12-cv-03872
Defendant	Starbucks Corporation
	<i>Innovatio IP Ventures, LLC v. United Parcel Service, Inc.</i> N.D. Ill. Case No. 1:12-cv-03874
Defendant	United Parcel Service, Inc.
	<i>Innovatio IP Ventures, LLC v. Wal-Mart Stores, Inc.</i> N.D. Ill. Case No. 1:12-cv-03878
Defendant	Wal-Mart Stores, Inc.
	<i>Innovatio IP Ventures, LLC v. FedEx Corporation et al.,</i> N.D. Ill. Case No. 1:12-cv-03882
Defendants	FedEx Corporation Federal Express Corporation FedEx Ground Package System, Inc. FedEx Freight Corporation FedEx Office and Print Services, Inc.

## EXHIBIT B

Title of Court	Date Admitted
New York State Court	06/10/1992
United States District Court - Eastern District of New York	02/16/1993
United States District Court - Southern District of New York	02/16/1993
United States Court of Appeals - Federal Circuit	04/26/1994
United States Supreme Court	02/22/1999